

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re: FIELDWOOD ENERGY LLC, et al., Post-Effective Date Debtors.¹ | § Chapter 11 § § Case No. 20-33948 (MI) § § (Jointly Administered) |
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**UNOPPOSED MOTION TO EXTEND TIME TO FILE
NOTICES OF APPEAL AND MOTIONS FOR LEAVE TO APPEAL**

BP Exploration & Production Inc. (“BP”) and Shell Offshore, Inc. (“Shell”) respectfully move pursuant to Rule 8002(d)(1)(A) of the Federal Rules of Bankruptcy Procedure to extend the time for BP and Shell to file Notices of Appeal and Motions for Leave to Appeal, through and including July 26, 2022, with respect to this Court’s *Amended Order* [D.E. 2530], entered in this action on June 21, 2022 and state:

1. On June 21, 2022, this Court entered the *Amended Order* [D.E. 2530], which order BP and Shell planned to appeal through motions for leave to appeal and notices of appeal pursuant to Rule 8004 of the Federal Rules of Bankruptcy Procedure. Currently, BP’s and Shell’s Notices of Appeal and Motions for Leave to Appeal are due on July 5, 2022.

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. Since entry of the *Amended Order*, the parties have been working to resolve certain issues including the *Amended Order*, but the parties do not anticipate resolution prior to the end of the day today—July 5, 2022—the current due date for the Notices of Appeal and Motions for Leave to Appeal from the *Amended Order*.

3. In order to preserve the status quo, BP and Shell are seeking 21-day extensions of their deadlines to file Notices of Appeal and Motions for Leave to Appeal, through and including July 26, 2022.

4. QuarterNorth Energy LLC (“QNE”) does not oppose this Motion.

WHEREFORE, the BP and Shell respectfully request the entry of an Order extending to July 26, 2022 the deadline by which BP and Shell may file their Notices of Appeal and Motions for Leave to Appeal from the Amended Order, and granting further relief as is just and proper.

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Date: July 5, 2022

Respectfully submitted,

GREENBERG TRAURIG, LLP

NORTON ROSE FULBRIGHT US LLP

By: /s/ Karl D. Burrer

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CERTIFICATE OF CONFERENCE

The undersigned certifies that on July 4th and 5th, 2022, he discussed the relief sought in this motion with QuarterNorth's counsel, Paul Genender, who indicated that QuarterNorth is unopposed to the relief sought in this motion.

By: /s/ Craig A. Duewall
Craig A. Duewall

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 5, 2022, I caused a copy of the foregoing to be served on all parties eligible to receive service through the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas by electronic mail.

By: /s/ Karl D. Burrer
Karl D. Burrer